

Alison L. Tsao, State Bar No. 198250  
Connor J. Moyle, State Bar No. 250384  
CARLTON DiSANTE & FREUDENBERGER LLP  
601 Montgomery Street  
Suite 350  
San Francisco, California 94111  
Telephone: (415) 981-3233  
Facsimile: (415) 981-3246  
E-Mail: [atsao@cdflaborlaw.com](mailto:atsao@cdflaborlaw.com)  
[cmoyle@cdflaborlaw.com](mailto:cmoyle@cdflaborlaw.com)

and

Christine S. Son (Pro Hac Vice)  
J.C. Penney Corporation, Inc.  
6501 Legacy Drive, MS 1122  
Plano, Texas 75024  
Telephone: (972) 431-1288  
Facsimile: (972) 531-1288  
E-mail: [csson@jcpenney.com](mailto:csson@jcpenney.com)

Attorneys for Defendant  
J.C. PENNEY CORPORATION, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**

DANELLE SANCHEZ,

Plaintiff,

vs.

J.C. PENNEY CORPORATION, INC.,

Defendant.

) Case No. 4:10-CV-02747-SBA

)  
) Judge: Hon. Sandra B. Armstrong  
) Ctrm: 9, 19th Floor

)  
) **STIPULATION AND ORDER**  
) **REGARDING MEDIATION DATES**

) Action Filed: June 23, 2010  
) Trial Date: September 19, 2011  
)

1 Plaintiff Danelle Sanchez ("Plaintiff") and Defendant J.C. Penney Corporation, Inc.  
2 ("Defendant"), by and through their respective counsel of record in this action, hereby stipulate as  
3 follows:

4 1. On October 16, 2010 (originally on September 29, 2010), this Court ordered that  
5 this case be referred to court mediation to be completed within 120 days. The 120 days expires on  
6 or around February 13, 2011.

7 2. On October 13, 2010, this Court notified the parties that Judith Droz Keyes of Davis  
8 Wright Tremaine LLP had been appointed to serve as the mediator.

9 3. On October 28, 2010, the parties and Ms. Keyes conferred to discuss mutually  
10 agreeable dates on which to mediate this matter.

11 4. In order to prepare so as to make the mediation meaningful, and in order to  
12 accommodate for scheduling conflicts, the parties and Ms. Keyes agree to an extension of the  
13 mediation deadline to March 25, 2011. Specifically, Ms. Keyes has other engagements that will  
14 make her unavailable to mediate this case between February 19 and March 10, 2011. Likewise,  
15 attorneys Beth Mora and Christine Son have trial and arbitration hearing dates currently set in the  
16 late January/early February 2011 time frame, and agree that an extension is appropriate.

17 5. As a result, the parties respectfully request this Court to extend the time frame for  
18 the parties to complete mediation from February 13, 2011 to March 25, 2011. This request for a  
19 continuance of the dates is mutually agreed upon and will not result in an injustice to Plaintiff.  
20

21 IT IS SO STIPULATED.  
22  
23  
24  
25  
26  
27  
28

1 Dated: November \_\_, 2010

CARLTON DiSANTE & FREUDENBERGER LLP  
Alison L. Tsao  
Connor J. Moyle

J.C. PENNEY CORPORATION, INC.  
Christine S. Son

6 By: \_\_\_\_\_  
Christine S. Son  
Attorneys for Defendant  
J.C. PENNEY CORPORATION, INC.

8 Dated: November \_\_, 2010

COOPER & MORA  
Beth W. Mora  
Elena Liveris


11 By: \_\_\_\_\_  
Beth Mora  
Attorneys for Plaintiff  
DANELLE SANCHEZ

\*\*\*\*\*

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED THAT:

The arbitration completion date of February 13, 2011 set forth in the October 16, 2010  
(originally September 29, 2010) Order is continued to March 25, 2011.

Dated: \_11/12/10

  
The Honorable Sandra B. Armstrong  
Judge of the United States District Court for  
The Northern District of California